

## REMARKS

Reconsideration and further examination of the subject patent application in light of the accompanying RCE, and the present Amendment and Remarks is respectfully requested. Claim 1-21 are currently pending in the application. Claims 1-3, 6-10 and 13-21 were rejected in the last Office Action under 35 U.S.C. §102(e) as being anticipated by U.S. Pat. Application Publication 2002/0035474 to Alpdemir, and claim 4-5, and 11-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over Alpdemir in view of Saylor et al. (U.S. Pat. No. 6,792,086) Independent claims 1, 8, 15, and 20 have been amended, dependent claims 2-5, 9-12, and 15-17 have been amended, and claim 21 has been cancelled. Applicant respectfully traverses the rejection.

As now claimed, the independent claims 1, 8, and 15 call for an artificial intelligence engine that uses a knowledge universe that is substantially limited to the enterprise activities of the organization. The Examiner has indicated that Alpdemir discloses use of a artificial engine to process and answer queries. However, even if Alpdemir did so, it does not disclose the use of an artificial intelligence engine with a knowledge universe substantially limited to the activities of the organization. In fact, the citation to Alpdemir pointed out by the Examiner (Office Action p. 2, para 2, line 11) does not provide an enabling disclosure of the claimed use of an artificial intelligence engine to answer the call center queries at all, but instead merely mentions AI is generally known and states that there will be no description of artificial intelligence. (See Alpdemir para [0141], line 8-9"... and artificial intelligence are known in

the art and not described in greater detail here"). Clearly, since Alpdemir does not discuss artificial intelligence engines, it does not disclose use of such engines with the knowledge universe as claimed. As discussed in the specification of the instant application, "by limiting the universe of knowledge of the AI engine 28 to the agenda of the organization, questions that would otherwise by[be]indeterminate may generalized or otherwise "spun" to reflect the objectives of the organization without loss of function" (p. 8, para 4). Thus, Alpdemir does not anticipate or render obvious independent claims 1, 8 and 15. Similarly, Saylor et al. does not disclose this feature.

In addition, independent claim 20, and dependent claim 3, 10 and 17 have been amended to call for the artificial intelligence engine to form the answer in VXML code form (see page 6, para. 1 of application). This feature is also not disclosed by Alpdemir or Saylor et al. Therefore, claim 20 and for this additional reason, claims 3, 10 and 17 are distinguished over either reference, or both references in combination.

Further, claims 2, 9 and 16 have also been amended to call for the artificial intelligence engine to use a caller record including identity and contact history to form a context. (See p. 8, para. 3 and p. 7, para. 2). Claims 5 and 12 have been amended to recite use by the artificial intelligence engine of expertise and inputs normally associated with a live agent. (See p. 7, para 2). These features also are not disclosed in Alpdemir and Saylor et al.

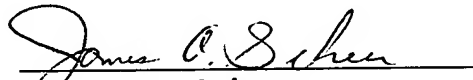
Thus, the independent claims 1, 8, 15, and 20 distinguish over Alpdemir and Saylor et al. for at least the above reasons, and are therefore believed to be

allowable. Claims 2-7, 9-14 and 16-19 are dependent upon now allowable claims 1, 8, and 15 are therefore also believed to be allowable.

Closing Remarks

For the foregoing reasons, applicant submits that the subject application is in condition for allowance and earnestly solicits a Notice of Allowance. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, the Examiner is respectfully requested to call the undersigned at the below-listed number.

Respectfully submitted,

  
James A. Scheer  
Reg. No. 29, 434

Dated: November 23, 2005

WELSH & KATZ, LTD  
120 South Riverside Plaza, 22<sup>nd</sup> Floor  
Chicago, Illinois 60606  
(312) 655-1500 Telephone  
(312) 655-1501 Facsimile